REMARKS

Reconsideration and allowance of the subject application are respectfully requested.

Upon entry of this Amendment, claims 1-26 and 28-30 are pending in the application with claims 26 and 28-30 being allowed. In response to the Office Action (Paper No. 21), Applicant respectfully submits that the pending claims define patentable subject matter.

Claim 1 is rejected under 35 U.S.C. § 102(e) as being anticipated by Hammarstrom et al. (U.S. Patent No. 6, 044,142). Claims 2-25 objected to as being dependent upon rejected claim 1 but would be allowable if rewritten in independent form.

As a preliminary matter, Applicant thanks the Examiner for indicating that dependent claims 2-25 contain allowable subject matter. However, Applicant respectfully requests the Examiner to hold in abeyance the rewriting of these claims until the Examiner has had the opportunity to reconsider the rejected parent claim 1 in light of the arguments presented below in support of the Applicant's traverse of the rejection.

Hammarstrom discloses a telecommunications system for integrating intelligent network services with operator assisted services. As shown in Figure 1, the telecommunications system includes an intelligent network (IN) 12 including a service control point 14 connected to a service switching point 18. The service control point 12 includes a service control function (SCF) 16 which includes service control logic and service control data. The service switching point 18 includes a service switching function 20 which, in addition to routing/switching functions, processes calls monitoring for IN service triggers. Telephone terminals for parties A and C are connected to the service switching point 18.

AMENDMENT UNDER 37 C.F.R. § 1.116 U.S. Patent Application No. 09/346,930

An IN integrated call center 22 is connected to the intelligent network 12. The IN integrated call center 22 includes a call center server (CCSX) 26 which is connected via a control communications path to the service control point 14, and a call center management server (CCMX) 24 which is connected to a telecommunications management network. An interactive voice response (IVR) unit 28 and a database 30 are connected via respective control paths to the call center server 26. The interactive voice response unit 28 is also connected to the service switching point 18 by a telephony transport path. The call center server 26 is also connected to a plurality of operator workstation terminals 40 by way of a wide area network (WAN) 32 and a local area network (LAN) 36. The operator workstation terminals 40 include computer and telephony hardware and software for performing operator-assisted services and for communicating over the network with the other workstations and the call center server 26.

The call center server 26 functions as an operational "gateway" to establish and coordinate communications between the service logic of the IN network 12 and the operators in the integrated call center 22. In handling requests from the service control point 14 for operator-assisted services, the call center server performs initial voice greetings using interactive voice response (IVR) unit 28, queues incoming calls in queue 34, and selects available and appropriate operators using a selector 42. The selector 42 is connected by a control path to the local area network 36 and by a telephony transport path to the service switching point 18. Under the control of an automatic call distribution (ACD) function in the call center server 26, the selector 42 routes incoming calls to the telephony equipment of selected workstations 40.

AMENDMENT UNDER 37 C.F.R. § 1.116 U.S. Patent Application No. 09/346,930

Independent claim 1 is directed to "[a]n interface device (IM) directly coupled between a network switch (SSP) of a public intelligent network and a computer telephony integration (CTI) server means (CTS)." By this Amendment, Applicant has amended claim 1 to require "said interface device (IM) being adapted to directly handle call-handling messages between a service switching function device (SSF) having a service switching functionality and included within said network switch (SSP) and said CTI server means (CTS)."

1. **Total CTI**

2. **Total CTI**

2. **Total CTI**

3. **Total CTI**

3. **Total CTI**

4. **Total CTI**

4. **Total CTI**

4. **Total CTI**

5. **Total CTI**

5. **Total CTI**

5. **Total CTI**

5. **Total CTI**

6. **Total CTI**

7. **Total CTI**

7. **Total CTI**

8. **Total CTI**

9. **Total CTI**

1. **Total CTI**

1

Applicant respectfully submits that Hammarstrom does not teach or suggest an interface device being adapted to directly handling.messages between a service switching function device having a service switching functionality and included within the network switch and the CTI server means. In Hammarstrom, there is no direct conversion/mapping (and accordingly no direct handling) between call handling messages of the two types of protocols (SSF and CTI). Instead, there is a first communication between SSF to SCF in a control (for instance INAP) protocol which is not a call handling protocol. Next, there is a mapping of operations between the CCSX service logic (not a call handling protocol) and the INAP protocol of the SCP within the CTI server of Hammarstrom. Accordingly, Hammarstrom communicates at a higher order logic or control level, via the service level protocols and their associated conversions, whereas in the present invention, the interface means allows communication at the lower call handling level.

Applicant respectfully submits the amendment to claim 1 should be entered because it does not raise new issues which would require further consideration and/or search. That is, the amendment to claim 1 simply incorporates subject matter (handling call handling messages) which is recited in the allowable dependent claims.

AMENDMENT UNDER 37 C.F.R. § 1.116 U.S. Patent Application No. 09/346,930

In view of the above, Applicant respectfully submits that claim 1 should be allowable

over Hammarstrom because the cited reference does not teach or suggest all of the features of the

claimed invention.

Reconsideration and allowance of this application are now believed to be in order, and

such actions are hereby solicited. If any points remain in issue which the Examiner feels may be

best resolved through a personal or telephone interview, the Examiner is kindly requested to

contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

SUGHRUE MION, PLLC

Telephone: (202) 293-7060

Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373
CUSTOMER NUMBER

Date: May 20, 2004

Christopher R. Lipp Registration No. 41,157

Attorney Docket No.: Q54844